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May 5, 2017

BY ECF

Hon. Steven Tiscione
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: *Cortes et al v. 215 Scotch Inc.. et al.*
Index No. 16-cv-0917 (ILG)(PK)

Your Honor:

I am the managing attorney with Michael Faillace & Associates, P.C., attorneys for Plaintiffs in the above-referenced matter. I write, with Defendants' counsel's consent to respectfully request an extension to the deadline for filing the joint motion for judicial approval, currently set for May 3, 2019 to June 3, 2019. This would be the third extension of this deadline.

Since the parties last wrote to your Honor, the parties have negotiated some additional terms in their agreement and settled on an agreement text. Two of the Defendants are currently outside of the United States, and therefore communication with them has required more time than usual. Additionally, getting their executed agreements has posed an additional challenge. We therefore respectfully request one additional month to finalize the agreement, and an adjournment of tomorrow's conference. We would be happy to provide a copy of the unexecuted agreement if the court wishes. We recognize the court's previous instruction regarding extension but given the circumstance respectfully and apologetically request this additional time.

We thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Michael Faillace
Michael Faillace, Esq.
MICHAEL FAILLACE & ASSOCIATES, P.C.
Attorneys for Plaintiffs

cc: Michael Taubenfeld, Esq. (by ECF)
Attorneys for Defendants